

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**PEOPLETLO MANUFACTURING, INC.,**

**Plaintiff,**

**v.**

**SUNDYNE, LLC; ACCUDYNE  
INDUSTRIES LLC; DXP  
ENTERPRISES, INC.; and  
PUMPWORKS, LLC,**

**Defendants,**

**Case No. 1: 20-CV-03642**

**Honorable Manish S. Shah**

**Magistrate Judge Young B. Kim**

**MOTION RELATING TO EXPERT SCHEDULE**

Plaintiff PeopleFlo Manufacturing, Inc. (“PeopleFlo”), by and through its counsel, submits this Motion:

1. PeopleFlo and Defendants Sundyne, LLC and Accudyne Industries, LLC (collectively “Defendants”) previously submitted a Joint Status Report setting the dates of certain expert matters.

2. Several of those dates have been moved by agreement. For example, Sundyne asked for an additional week to issue its liability expert report (Mr. van der Sluijs), and PeopleFlo agreed to this extension. The deposition of Mr. Blankemeier also was adjusted by one week, and this deposition has occurred.

3. Due to other discussions (discussed briefly below) and obligations in this and other matters, PeopleFlo and its damages expert (Secretariat) require an additional week (from October 10 to October 17) for Secretariat to issue its expert report.

4. If this date is reset, PeopleFlo has agreed to reset the date for Defendants' rebuttal expert by one week also (to November 21, 2025) and the date to complete expert depositions by one week also (to December 12, 2025).<sup>1</sup>

5. There is good cause for this request. In addition to the small amount of time requested (one week) and the minimal (if any) impact on the expert schedule, PeopleFlo's counsel (Mr. Ruskusky) discussed this request with Defendants' counsel (Mr. Sheean), who initially stated that it should be agreeable. As a result, and due to the other communications referenced above,<sup>2</sup> PeopleFlo and Secretariat expected that this short extension would be entered by agreement and addressed certain other matters. Mr. Sheean subsequently reported that the Motion could not be filed as unopposed because the reset dates would leave limited time with the intervening Thanksgiving week to complete expert depositions.<sup>3</sup>

6. PeopleFlo respectfully submits that this issue can be readily and reasonably addressed as follows, which it has shared with Defendants' counsel.

7. The Secretariat deposition can remain on December 3, 2025, or if Defendants would like another date in December, that is agreeable to PeopleFlo with numerous additional available dates in December. PeopleFlo also agrees to a reasonable extension of the expert deposition deadline to accommodate this item.

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<sup>1</sup> Defendants have not designated a rebuttal damages expert at this time, and thus, the parties agreed to the rebuttal date of 35-days after the initial report. PeopleFlo is open to additional time if Defendants require it.

<sup>2</sup> These discussions include settlement communications and thus are not detailed herein. If the Court would like further information, PeopleFlo's counsel can share them in a status conference or in an email. Similarly, PeopleFlo's counsel is happy to share details on the other matters (some relating to this case and some related to other clients) if that would assist the Court.

<sup>3</sup> The Secretariat deposition has been scheduled for December 3, 2025, which is 48-days after its report will be served if this Motion is granted. Secretariat and PeopleFlo's counsel are available for this deposition on various other dates in December.

WHEREFORE, PeopleFlo hereby requests that the Court enter an Order allowing its damages expert (Secretariat) until October 17, 2025 to issue its damages report and Rule 26(a)(2) disclosure, and for such other relief as is appropriate.

Dated: October 7, 2025

Respectfully submitted,

By: /s/ John T. Ruskusky

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*Attorney for Plaintiff PeopleFlo  
Manufacturing, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 7, 2025, he served a copy of the foregoing on all counsel of record via electronic case filing procedures.

/s/ John T. Ruskusky  
*Counsel for PeopleFlo Manufacturing, Inc.*